

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

CGG 18-021730  
LOGS Legal Group LLP  
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Mount Laurel, NJ 08054  
(856) 793-3080  
Elizabeth L. Wassall, Esq. 023211995  
ATTORNEYS FOR THE BANK OF NEW YORK  
MELLON, F/K/A THE BANK OF NEW YORK AS  
TRUSTEE FOR REGISTERED HOLDERS OF CWABS,  
INC., ASSET-BACKED CERTIFICATES, SERIES  
2005-7

In Re:

WILLIAM K. STANLEY AND ELLA D. STANLEY,  
DEBTORS

Case No.: 17-23648-ABA

Judge: HONORABLE ANDREW B.  
ALTENBURG, JR.

Chapter: 13

### NOTICE OF OBJECTION TO CONFIRMATION

The undersigned, LOGS Legal Group LLP, attorneys for the Secured Creditor, THE BANK OF NEW YORK MELLON, F/K/A The Bank of New York as trustee for registered Holders of CWABS, Inc., Asset-Backed Certificates, Series 2005-7, the holder of a Mortgage on Debtors' property located at 644 Cresson Avenue, Pleasantville, NJ 08232, hereby objects to the Confirmation of the Debtors' proposed Modified Chapter 13 Plan, ECF # 103, on the following grounds:

1) Debtors' proposed Modified Chapter 13 Plan proposes to pay *post*-petition arrears in the plan, but does not specify which post-petition months are being cured by the proposed amount, nor on which month the regular post-petition payments are to resume outside the plan to Secured Creditor.

WHEREFORE, THE BANK OF NEW YORK MELLON, F/K/A The Bank of New York  
as trustee for registered Holders of CWABS, Inc., Asset-Backed Certificates, Series 2005-7  
respectfully requests that the Confirmation of Debtors' Modified Chapter 13 Plan be denied.

LOGS LEGAL GROUP LLP

By: /s/Elizabeth L. Wassall  
Elizabeth L. Wassall, Esq.

Dated: 11-5-2021

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**CERTIFICATION OF SERVICE**

I, Linda Wright the undersigned

1. ☐ represent the \_\_\_\_\_ in the above-captioned matter.  
☒ am the secretary/paralegal for Kathleen M. Magoon, Esquire and Elizabeth L. Wassall, Esquire, who represents the Secured Creditor in the above-captioned matter.  
☐ am the \_\_\_\_\_ in the above case and am representing myself.
2. On 11/5/2021, I sent a copy of the following pleadings and/or documents to the parties listed in the chart below:
  - Notice of Objection to Confirmation
3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Signature

Dated: 11/5/2021

/s/ Linda Wright

Printed Name

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Robert A Loefflad Ford Flower Hasbrouck & King Central Square, Suite 42A P.O. Box 405 Linwood, NJ 08221		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
Isabel C. Balboa Chapter 13 Standing Trustee Cherry Tree Corporate Center 535 Route 38 - Suite 580 Cherry Hill, NJ 08002		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
William K. Stanley and Ella D. Stanley 644 Cresson Avenue Pleasantville, NJ 08232		<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)

\* May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.